

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

L2 MOBILE TECHNOLOGIES LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 6:21-cv-358-ADA

JURY TRIAL DEMANDED

**DECLARATION OF DEEPA ACHARYA IN SUPPORT OF DEFENDANT GOOGLE
LLC'S MOTION TO TRANSFER VENUE TO THE NORTHERN DISTRICT OF
CALIFORNIA UNDER 28 U.S.C. § 1404(a)**

I, Deepa Acharya, declare as follows:

1. I am a partner at the law firm of Quinn Emanuel Urquhart & Sullivan, LLP, counsel for Defendant Google LLC ("Google"). I have personal knowledge of the facts stated herein and if called to testify could and would competently testify thereto.

2. Attached hereto as Exhibit 1 is a true and correct copy of the Area of Service function on the U.S. Marshals Service webpage, available at <https://www.usmarshals.gov/district/tx-w/general/area.htm>, with annotations indicating that Collin County and Denton County are located in the Eastern District of Texas, and Dallas is located in the Northern District of Texas.

3. Attached hereto as Exhibit 2 is a true and correct copy of a screenshot of the Franchise Tax Account Status for "L2 Mobile Technologies LLC" on the Texas Comptroller of Public Accounts webpage.

4. Attached hereto as Exhibit 3 is a true and correct copy of the LinkedIn profile of Christian Dubuc, available at <https://www.linkedin.com/in/christian-dubuc-b65ba73/> (last accessed on July 2, 2021).

5. Attached hereto as Exhibit 4 is a true and correct copy of the webpage titled “Longhorn IP Announces Key Leadership Changes,” Harfang IP, posted November 21, 2019, available at <https://harfangip.com/longhorn-ip-announces-key-leadership-changes> (last accessed on July 2, 2021).

6. Attached hereto as Exhibit 5 is a true and correct copy of a screenshot of the Franchise Tax Account Status for “Longhorn IP LLC” on the Texas Comptroller of Public Accounts webpage.

7. Attached hereto as Exhibit 6 is a true and correct copy of the webpage titled “Contact Us,” Longhorn IP, <https://www.longhornip.com/contact-us> (last accessed on July 2, 2021).

8. The names, positions, and locations of the employees listed on Longhorn’s website, available at <https://www.longhornip.com/people>, a true and correct copy of which is attached as Exhibit 7, are shown in the chart below:

Exhibit	Name	Position	Location
Exhibit 8	Khaled Fekih-Romdhane	Founder, President, CEO	Dallas, TX
Exhibit 9	Do Kim	General Counsel	Dallas, TX
Exhibit 10	Soogeun Lee	Vice-President, Engineering	Ottawa, ON, Canada
Exhibit 11	Hassan Zeino	Vice President, Engineering	Ottawa, ON, Canada
Exhibit 12	Bayram Hammami	Vice President, European Operations	France

9. Attached hereto as Exhibit 13 is a true and correct copy of a screenshot of the Franchise Tax Account Status for “Tanit Ventures Inc.” on the Texas Comptroller of Public Accounts webpage.

10. Attached hereto as Exhibit 14 is a true and correct copy of “Pixel by Google,” Qualcomm, available at <https://www.qualcomm.com/snapdragon/smartphones/pixel-google> (last accessed on July 2, 2021).

11. The names, roles, and locations of potentially relevant third-party witnesses and evidence are listed in the chart below.

Exhibit	Name	Role	Location
Exhibit 15	Qualcomm Inc.	Supplier of processors for Pixel Products	HQ in San Diego, California; Incorporated in Delaware.
Exhibit 16	Sam Shiaw-Shiang Jang	Patent inventor for U.S. Patent Nos. 8,179,913 (“the ’913 patent”); 8,054,777 (“the ’777 patent”); and co-inventor for RE47,200 (“the ’200 patent”)	Taipei, Taiwan
Exhibit 16	Richard Lee-Chee Kuo	Patent co-inventor for the ’200 patent	Taipei, Taiwan
Exhibit 16	Chi-Fong Ho	Patent co-inventor for the ’200 patent	Hsin-Chu Hsien, Taiwan
Exhibit 17	Blue Capital Law Firm, P.C.	Registered prosecuting attorney/agent for the ’913 patent and ’777 patent	Costa Mesa, CA
Exhibit 18	Andrew Chen	Registered prosecuting attorney/agent for ’913 patent and the ’777 patent	Los Angeles, CA

Exhibit 19	Sang Dang	Registered prosecuting attorney/agent for the '913 patent and the '777 patent	Costa Mesa, CA
Exhibit 20	Klein, O'Neill & Singh LLP	Named prosecuting attorneys on the face of the '913 patent and the '777 patent	Irvine, CA
Exhibit 21	Fitch, Even, Tabin & Flannery LLP	Registered prosecuting attorney/agent for the '200 patent; correspondent for the '200 patent assignments	Chicago, IL
Exhibit 22	Innovative Sonic Limited	Original assignees for the '913 patent; second assignees for the '777 patent and the '200 patent	Ebene, Mauritius
Exhibit 23	ASUSTeK Computers Inc.	Original assignee for the '777 and '200 patents	Taipei, Taiwan
Exhibit 24	Birch, Stewart, Kolasch & Birch, LLP	Correspondent for the original assignment of the '913 patent, '777 patent	Falls Church, VA
Exhibit 25	Joe McKinney Muncy	Correspondent for the original assignment of the '913 patent, '777 patent	Fairfax, VA

12. The names, affiliations, and locations of potentially relevant third-party witnesses to the parties pre-suit discussions are listed in the chart below.

Exhibit	Name	Affiliation	Location
Exhibit 26	Nicholas T. Peters	Fitch, Even, Tabin & Flannery, LLP	Chicago, IL
Exhibit 27	Joseph F. Marinelli	Fitch, Even, Tabin & Flannery, LLP	Chicago, IL

Exhibit 28	Curt Dodd	Harfang IP	Laguna Beach, CA
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13. Attached hereto as Exhibit 29 is a true and correct copy of the [REDACTED]

[REDACTED]

[REDACTED].

14. Attached hereto as Exhibit 30 is a true and correct copy of the flight schedules from San Francisco International Airport (SFO) to Waco Regional Airport (ACT) on May 5, 2022 from Google flights. There are no nonstop flights available. Travel times range from 4 hours and 53 minutes to 12 hours and 18 minutes.

15. Attached hereto as Exhibit 31 is a true and correct copy of a report from Docket Navigator showing a comparison of the median time to trial between the Western District of Texas and the Northern District of California in the 2010-2021 timeframe.

I declare under the laws of the United States of America that the foregoing is true and correct. Executed July 6, 2021 in Marshall, Texas.



Deepa Acharya